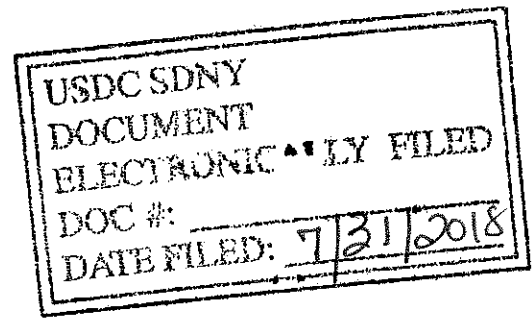


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



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BELLEAU TECHNOLOGIES, LLC,

Plaintiff,

v.

18 Civ. 06319 (DLC)

JOEALLENPRO LIMITED, a foreign corporation;
and JOE ALLEN, as an individual,

Defendants.
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9
PROPOSED ORDER GRANTING PLAINTIFF'S
MOTION FOR A PRELIMINARY INJUNCTION

Upon consideration of Plaintiff Belleau Technologies, LLC's ("Belleau") Motion for a Preliminary Injunction and supporting documents [ECF Nos. 016-019], and being fully advised, this Court hereby GRANTS Belleau's Motion for a Preliminary Injunction.

Belleau has satisfied all of the requirements for preliminary injunctive relief. In particular, Belleau has demonstrated that it is likely to succeed on the merits of its patent infringement claim. Plaintiff has further demonstrated that, without injunctive relief, it will suffer substantial, irreparable harm and have no adequate remedy at law. Additionally, the balance of hardships between the parties favors Belleau. Finally, the public interest favors the issuance of an injunction as there is a compelling, intrinsic public interest in protecting rights secured by patents. Accordingly, it is hereby ORDERED that, pending a trial on the merits or further order of this Court, Defendants Joe Allen and JoeAllenPro Limited, their employees, agents, subsidiaries, affiliates, parents, successors, assigns, officers, servants, attorneys, and any other person in active concert or participation with them are:

1. Enjoined from any conduct that infringes, directly or indirectly, U.S. Patent No. 9,953,646, including making, selling, distributing, marketing, testing, importing, offering to sell, or otherwise using a software product called "AutoPrompter" – or any other software application infringing U.S. Patent No. 9,953,646 – within the United States;

2. *After placing a copy of the software product called "AutoPrompter."* Ordered to ~~immediately~~ destroy any copies of the software product called "AutoPrompter" – or any other software application infringing U.S. Patent No. 9,953,646 – in their possession, custody, or control; *and any corresponding source code with a neutral third party, the defendants are*

3. Ordered to immediately take down and/or destroy any remaining marketing for the software product called "AutoPrompter," including, but not limited to, taking down the autoprompter.com website, removing the AutoPrompter promotional video posted by Joe Allen on YouTube available at <https://www.youtube.com/watch?v=bbIBYm8bxBw>, removing all references to the software product called "AutoPrompter" on the joeallenpro.com website, deleting the @AutoPrompter twitter account; removing all references to the software product called "AutoPrompter" from the @joeallenpro twitter account, including deletion of retweets from others; and further destroying any hard copy and electronic marketing images used (or images that could be used, including all back-ups) to promote the software product called "AutoPrompter" in the App Store, on the internet, or elsewhere; and

4. Ordered to turn over to the Court any proceeds received as a result of the sale of the software product called "AutoPrompter" – or any other software application infringing U.S. Patent No. 9,953,646.

This Court has exercised its discretion to determine that no bond shall be required and that this Order shall be effective immediately

So ordered.
James L. Cox
July 31, 2018

Dated: July ___, 2018

SO ORDERED:

Hon. Denise L. Cote
United States District Judge